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July 22, 2021

By ECF

The Honorable Judge Castel
United States District Judge
Southern District of Texas
500 Pearl Street
New York, New York, 10007

Re: United States v. Guillermo Perez, 19-cr-781

Dear Judge Castel,

Since the initial pre-trial conference in the above referenced case, held on June 22, 2021, the government has produced voluminous Rule 16 discovery. Specifically, on or about June 30, 2021, the government sent defense counsel a hard drive containing approximately 210,000 pages of discovery. That discovery was received by defense counsel on or about July 6, 2021. According to the Government, it has completed production of all of the Rule 16 materials in its possession at this time. Defense counsel has made every effort to get through the 200,000+ pages of discovery but has not yet been able to review all of the voluminous discovery which was produced.

On or about July 21, 2021, defense counsel and the government spoke on the phone about discovery and about a possible extension of the pre-trial conference set for July 27, 2021. Both the defense and the government agree that a 90-day extension would allow defense counsel an opportunity to meaningfully review all of the discovery produced by the government. Therefore, please allow this letter to serve as a request for the conference set for July 27, 2021 to be continued until October 27, 2021 or an amenable date for the court to allow the defense an opportunity to get through the voluminous discovery produced by the government and provide effective assistance of counsel to the Defendant.

The defense further requests, with the consent of the Government, that the Court exclude time between today and the date the Court schedules the pre-trial conference pursuant to 18 U.S.C. § 3161(h)(7). The Defense and the government submit that the ends of justice served by the exclusion outweigh the best interest of the public and the defendant in a speedy trial.

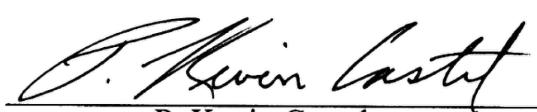
Respectfully Submitted,

/s/ Alexander J. Houthuijzen

Alexander J. Houthuijzen

Upon the application of defense counsel, consented to by the government, the pretrial conference originally scheduled for July 27, 2021 is adjourned to October 28, 2021 at 12:00 p.m. and will proceed by videoconference. I find that the ends of justice will be served by granting a continuance and that taking such action outweighs the best interest of the public and the defendant in a speedy trial. The reasons for this finding are that the grant of the continuance is necessary to allow defense counsel an opportunity to meaningfully review all the discovery produced by the government. Accordingly, the time between today and October 28, 2021 is excluded.

SO ORDERED.


P. Kevin Castel
United States District Judge

7/23/2021